

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

-----X
J.V., a Minor, by her Mother and Natural Guardian
Judy Gladd,

Plaintiff,

VERIFIED COMPLAINT

-against-

Index No.

RAWLE ROBERTS,

Defendant.

-----X

Plaintiff, by her attorney, HARRY I. KATZ, P.C., as and for her Verified Complaint,
alleges as follows:

1. This case falls within one or more of the exceptions to CPLR § 1602.
2. Plaintiff J.V. is a minor having been born in September, 2003.
3. Plaintiff Judy Gladd is the Mother and Natural Guardian of the minor, J.V.
4. From approximately 2007 until March, 2019, defendant resided in the same household
as the plaintiff.
5. From approximately 2007 through approximately 2013, defendant molested the
plaintiff, J.V.

6. From approximately 2007 through approximately 2013, plaintiff, J.V. was sexually and physically assaulted by the defendant.

7. During the aforementioned time period, the defendant touched plaintiff's vagina.

8. During the aforementioned time period, the defendant put his fingers in the plaintiff's vagina.

9. During the aforementioned time period, the defendant forced the plaintiff to masturbate him.

10. During the aforementioned time period, the defendant performed oral sex on the plaintiff.

11. The aforementioned acts were done without the consent of the plaintiff.

12. Upon information and belief, on or about March 9, 2019, defendant was arrested and charged under criminal complaint CR00753619QN.

13. Upon information and belief, on or about September 27, 2019, defendant appeared in the Queens Criminal Court.

14. Upon information and belief, on or about September 27, 2019, defendant plead guilty to New York Penal Law Section 260.10: Endangering the Welfare of a Child.

15. The defendant intentionally and/or recklessly inflicted emotional distress upon the plaintiff.

16. That as a result of the foregoing, plaintiff suffered emotional and psychological injuries.

17. That as a result of the aforesaid occurrence, the plaintiff continues to suffer embarrassment, emotional and psychological injury, was required to and did receive medical treatment for her injuries and may in the future be so required, was forced to expend various sums of money in an effort to cure herself and may in the future be so required, was prevented from attending to her usual duties and activities and may in the future be so prevented, all to her damage in an amount which exceed the jurisdictional amount of all lower courts which would otherwise have jurisdiction, and the and defendant is liable for punitive damages.

AS AND FOR A SECOND CAUSE

18. Plaintiff repeats each allegation above as though fully set forth herein at length.

19. That the aforementioned constituted an assault on the plaintiff.

20. That as a result of the aforesaid occurrence, the plaintiff continues to suffer embarrassment, emotional and psychological injury, was required to and did receive medical treatment for her injuries and may in the future be so required, was forced to expend various sums of money in an effort to cure herself and may in the future be so required, was prevented from attending to her usual duties and activities and may in the future be so prevented, all to her damage in an amount which exceed the jurisdictional amount of all lower courts which would otherwise have jurisdiction and the and defendant is liable for punitive damages.

WHEREFORE, plaintiff demands judgment in the first cause second causes of action in an amount which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction, and punitive damages, together with costs and disbursements of this action.

Yours, etc.

HARRY I. KATZ, P.C.

BY: 

VICTORIA L. WEINMAN

Attorneys for Plaintiff

61-25 Utopia Parkway

Fresh Meadows, New York 11365

(718) 463-3700

STATE OF NEW YORK)
)s.s.:
COUNTY OF QUEENS)

Judy Gladd

being duly sworn deposes and says:

Deponent is the plaintiff in the within action and has read the foregoing

Complaint

and knows the contents thereof, that the same are true to deponent's own knowledge,
except as to the matters therein started to be alleged on information and belief and as to
those matters deponent believes them to be true.

Judy A. Gladd

Sworn to before me this 19th
day of November, 2019


Notary Public

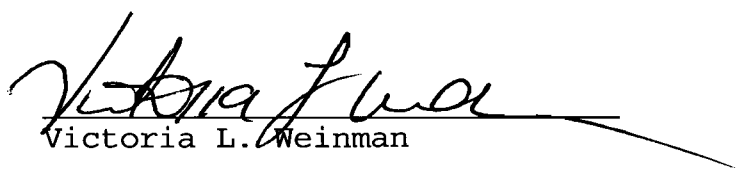
JOANN EVERS
Notary Public, State of New York
No. 01EV4988644
Qualified in Queens County
Commission Expires November 12, 2021

CERTIFICATION

Victoria L. Weinman, an attorney-at-law duly admitted to practice law before the Courts of the State of New York, hereby certifies as follows:

To the best of my knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of the paper or the contentions herein are not frivolous, as that term is defined in Part 130 of the Rules of the Chief Administrator (22 NYCRR).

DATED: Fresh Meadows, NY
November 19, 2019


Victoria L. Weinman

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SUMMONS and VERIFIED COMPLAINT

HARRY I. KATZ, P.C.

Attorney for Plaintiff(s)

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(718) 463-3700

(718) 886-3410 (Fax)

Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed documents are not frivolous.

Dated: _____

Service of a copy of the within

is hereby admitted.

Dated:

Attorney(s) for